

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CREATIVE PHOTOGRAPHERS, INC.,

Plaintiff,

v.

GIRARD ENTERTAINMENT & MEDIA LLC,
and KEITH GIRARD,

Defendants.

Civil Action No.: 1:21-cv-09398-JSR

**PLAINTIFF'S RESPONSES TO
DEFENDANT GIRARD
ENTERTAINMENT & MEDIA LLC'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTY: GIRARD ENTERTAINMENT & MEDIA LLC

RESPONDING PARTY: CREATIVE PHOTOGRAPHERS, INC.

SET: TWO

PROPOUNDING PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff Creative Photographers, Inc., pursuant to Federal Rules of Civil Procedure §34, hereby responds to Defendant Girard Entertainment & Media LLC's Second Set of Requests for Production of Documents as follows:

GENERAL OBJECTIONS

The responses contained herein are given without prejudice to producing at the time of trial subsequently discovered information or information omitted from said answers due to good faith oversight.

In setting forth his answers, Plaintiff does not waive the attorney-client privilege, attorney work-product privilege, or any other privilege or immunity from disclosure which may attach to information called for in, or responsive to, any request for production or interrogatory, Plaintiff

does not concede the relevance or materiality of the request, or the subject matter to which the requests or interrogatories refer.

These responses are submitted by Plaintiff subject to, and without in any way waiving or intending to waive, but on the contrary, intending to reserve and reserving:

- (1) All questions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of any of the documents referred to on responses given or the subject matter thereof, in any subsequent proceeding in, or the trial of, this action or any other action or proceeding;
- (2) The right to object to other discovery procedure involving or related to the subject matter of the requests herein responded to including any Request for Production of Documents specifically identified herein; and,
- (3) The right at any time to revise, correct, add to, or clarify any of the answers set forth herein, or documents produced or referred to herein.

Plaintiff objects that discovery is ongoing, and that Plaintiff has not completed his investigation of this matter. Therefore, Plaintiff reserves the right to provide additional information or documents as it discovers them through this matter.

Each of the foregoing objections is incorporated by reference to each of the following responses as if fully set forth therein. Each of the responses below is subject to each of the foregoing objections.

RESPONSES TO REQUESTS FOR PRODUCTION

Request No. 10 (Request No. 1): All documents concerning the creation of the Photographs, including all communications related thereto.

Response to Request No. 10 (Request No. 1): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 11 (Request No. 2): All documents prepared for the purpose of registering the Registrations with the U.S. Copyright Office, including the application for copyright registration and the deposit copy materials.

Response to Request No. 11 (Request No. 2): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 12 (Request No. 3): All documents provided by you to the U.S. Copyright Office in connection with the Registrations.

Response to Request No. 12 (Request No. 3): Without waiver, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 13 (Request No. 4): All communications between you on the one hand, and the U.S. Copyright Office on the other hand, concerning the registration of the Photographs or any other photograph encompassed in the Registrations, including communications with third parties that relate to those communications.

Response to Request No. 13 (Request No. 4): Without waiver, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 14 (Request No. 5): All documents concerning your publication, display, promotion, and/or exploitation of the Photographs.

Response to Request No. 14 (Request No. 5): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 15 (Request No. 6): All documents and communications with Matthias Vriens McGrath concerning the Photographs, Defendants, or the allegations in the Complaint, including all agreements with Matthias Vriens McGrath and communications concerning same.

Response to Request No. 15 (Request No. 6): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information.

Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 16 (Request No. 7): All documents and communications with Jeff Lipsky concerning the Photographs, Defendants, or the allegations in the Complaint, including all agreements with Jeff Lipsky and communications concerning same.

Response to Request No. 16 (Request No. 7): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 17 (Request No. 8): All documents and communications with Ruven Afanador concerning the Photographs, Defendants, or the allegations in the Complaint, including all agreements with Ruven Afanador and communications concerning same.

Response to Request No. 17 (Request No. 8): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 18 (Request No. 9): All documents concerning any copyright rights in the Photographs you claim to own or exclusively control.

Response to Request No. 18 (Request No. 9): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 19 (Request No. 10): All agreements, contracts, or understandings between Matthias Vriens McGrath and any third party concerning photographs he purports to own and/or have authored, including all licensing agreements.

Response to Request No. 19 (Request No. 10): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 20 (Request No. 11): All agreements, contracts, or understandings between Jeff Lipsky and any third party concerning photographs he purports to own and/or have authored, including all licensing agreements.

Response to Request No. 20 (Request No. 11): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 21 (Request No. 12): All agreements, contracts, or understandings between Ruven Afanador and any third party concerning photographs he purports to own and/or have authored, including all licensing agreements.

Response to Request No. 21 (Request No. 12): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 22 (Request No. 13): All documents concerning any efforts undertaken by you or any of your agents or representatives to enforce any of your alleged rights in the Photographs against any person or entity.

Response to Request No. 22 (Request No. 13): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks

disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 23 (Request No. 14): All documents concerning the publication, display, promotion, and/or exploitation of photographs by Matthias Vriens McGrath, Jeff Lipsky, or Ruven Afanador.

Response to Request No. 23 (Request No. 14): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 24 (Request No. 15): All documents concerning the display of the Photographs on any of the Websites, including all documents concerning your awareness, or the awareness of any of your agents or representatives, of the presence of the Photographs on the Websites.

Response to Request No. 24 (Request No. 15): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks

disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 25 (Request No. 16): All documents concerning Defendants or any predecessor, including all communications with Defendants or its counsel, concerning the display of the Photographs on any of the Websites.

Response to Request No. 25 (Request No. 16): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request to the extent it seeks documents in Defendants' possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 26 (Request No. 17): All communications between you and any third party that sought a prospective license to reproduce, adapt, distribute, or publicly display the Photographs.

Response to Request No. 26 (Request No. 17): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 27 (Request No. 18): All agreements, contracts, or understandings whereby you prospectively licensed, authorized, or otherwise granted permission to any person for the use of the Photographs in any manner, including all communications thereto.

Response to Request No. 27 (Request No. 18): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 28 (Request No. 19): Documents sufficient to identify all licensing fees from licensing the Photographs for prospective use in any manner.

Response to Request No. 28 (Request No. 19): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 29 (Request No. 20): All documents, including but not limited to communications, reports, memoranda, and analyses, concerning any valuation or appraisal of the copyrights in the Photographs.

Response to Request No. 29 (Request No. 20): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 30 (Request No. 21): All documents concerning terms of use or other contracts related to any licensing entity through which you have offered to license the Photographs or any other photograph(s), including all communications thereto.

Response to Request No. 30 (Request No. 21): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 31 (Request No. 22): All settlement agreements concerning the Photographs.

Response to Request No. 31 (Request No. 22): Plaintiff objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Discovery is ongoing; right to supplement reserved.

Request No. 32 (Request No. 23): All documents concerning the alleged use of the Photographs by Defendants.

Response to Request No. 32 (Request No. 23): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request to the extent it seeks documents solely within Defendants' possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to

this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 33 (Request No. 24): All documents concerning any damages, injury, or losses that you contend you have suffered as a result of the alleged use, reproduction, adaptation, distribution, display, and/or storage of the Photographs on the Websites.

Response to Request No. 33 (Request No. 24): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request to the extent it seeks information solely within Defendants' custody. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 34 (Request No. 25): All documents concerning any lawsuits brought by you alleging infringement of the Photographs or photograph(s) you allege you own and/or exclusively control.

Response to Request No. 34 (Request No. 25): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Discovery is ongoing; right to supplement reserved.

Request No. 35 (Request No. 26): All documents concerning your allegation in paragraph 5 of the Complaint that “Girard Entertainment owns, operates, and is solely responsible for the content posted to the websites, www.thenyindependent.com, and www.celebrityhealthfitness.com, and corresponding social media.”

Response to Request No. 35 (Request No. 26): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request to the extent it seeks information solely within Defendants’ possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 36 (Request No. 27): All documents concerning your allegations underlying the heading “FACTUAL ALLEGATIONS COMMON TO ALL CLAIMS” in the Complaint.

Response to Request No. 36 (Request No. 27): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request to the extent it seeks information solely within Defendants’ possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 37 (Request No. 28): All documents concerning your allegations underlying the heading “COUNT I: INFRINGEMENT OF COPYRIGHT PURSUANT TO 17 U.S.C. § 101 ET SEQ.” in the Complaint.

Response to Request No. 37 (Request No. 28): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request to the extent it seeks information solely within Defendants’ possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 38 (Request No. 29): All documents concerning efforts by you to enforce your copyrights in the Photographs.

Response to Request No. 38 (Request No. 29): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control as it pertains to the enforcement at issue in this action. Discovery is ongoing; right to supplement reserved.

Request No. 39 (Request No. 30): All documents concerning efforts you took to detect the alleged infringement in this case.

Response to Request No. 39 (Request No. 30): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 40 (Request No. 31): All documents concerning the Allegedly Infringing URLs, including efforts you took to detect and identify the Allegedly Infringing URLs.

Response to Request No. 40 (Request No. 31): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 41 (Request No. 32): All communications with any publisher, publication or media outlet, including but not limited to Hearst Communications, Meredith Corporation, and/or Conde Nast, and any representatives and/or employees thereof, related to the creation, licensing, or other use of the Photographs.

Response to Request No. 41 (Request No. 32): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks

disclosure of business sensitive, confidential information and third party confidential information. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 42 (Request No. 33): All documents concerning any allegation that the alleged infringement was willful.

Response to Request No. 42 (Request No. 33): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request to the extent that it seeks information solely within Defendants' possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Request No. 43 (Request No. 34): All communications with third parties regarding Defendants or alleged infringement of photographs.

Response to Request No. 43 (Request No. 34): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request as vague, overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.


Request No. 44 (Request No. 35): All communications sent or received by you and/or your current or former attorneys, whether or not counsel-of-record in this lawsuit, regarding Defendants or alleged infringement of photographs.

Response to Request No. 44 (Request No. 35): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request as vague, overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control as they pertain to Defendants. Discovery is ongoing; right to supplement reserved.

Request No. 45 (Request No. 36): All documents not otherwise produced pursuant to the Requests concerning Defendants, the Photographs, the Registrations, the allegations in the Complaint, or copyright infringement.

Response to Request No. 45 (Request No. 36): Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this request on the grounds that it seeks disclosure of business sensitive, confidential information and third party confidential information. Plaintiff further objects to this request as overbroad, irrelevant, and disproportionate to the needs of the case to the extent it seeks information regarding photographs not at issue and copyright infringement generally. Plaintiff further objects to this request to the extent it seeks information solely within Defendants' possession, custody, or control. Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this request in its possession, custody, or control. Discovery is ongoing; right to supplement reserved.

Dated: March 4, 2022
New York, New York

By: 

Scott Alan Burroughs, Esq.
Laura M. Zaharia, Esq.
Attorneys for Plaintiff Creative Photographers, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **PLAINTIFF'S
RESPONSES TO DEFENDANT GIRARD ENTERTAINMENT & MEDIA LLC'S
SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

upon attorneys for Defendants by sending a copy of same via electronic mail, to:

Eleanor Lackman
eml@msk.com

Leo M. Lichtman
lml@msk.com

Attorneys for Defendants Girard Entertainment & Media LLC and Keith Girard

Dated: March 4, 2022

By: /s/ Laura M. Zaharia
Scott Alan Burroughs, Esq.
Laura M. Zaharia, Esq.
*Attorneys for Plaintiff Creative
Photographers, Inc.*